

## REMARKS

The applicant has carefully considered the Office action dated June 29, 2005. By way of this Response, claims 12-19 have been amended and new claim 21 has been added. In view of forgoing amendments and the following remarks, it is respectfully submitted that all pending claims are in condition for allowance and favorable reconsideration is respectfully requested.

As an initial matter, the title has been amended as suggested by the examiner. In addition, claims 13-15 and 17-19 have been amended to correct the informalities noted by the examiner.

Turning to the substantive rejections, claim 12 recites, *inter alia*, that the first conductive layer is formed of a material different from a material of the second conductive layer from that of the second conductive layer, and the second metal lines prevent ions of the first metal lines from being diffused into the substrate.

Anand is directed to a semiconductor device and method of manufacturing the same. In particular, Anand states, "The metal portion 17' is made of, for example, aluminum, copper or an alloy of these metals." (Col. 7, lines 66-67) "The metal [portion] 20b ... [is] made of, for example, aluminum, copper or an alloy of these metals." (Col. 8, lines 66-67) Anand does not disclose or suggest that the material of the first metal line is different than the material of the second metal line and/or that the second metal lines prevent ions of the first metal lines from being diffused into the substrate. Rather, Anand describes the same list of materials for the metal portion 17' and the metal portion 20b. Further, Anand indicates that the metal portions are manufactured by a dual damascene process (Col. 7, lines 5-7) and each of the metal portions, which are at different levels, are metal lines (Col. 1, lines 61-62). Therefore, Anand provides no reason to use different metals in the two metal lines.

Iwasaki is directed to a semiconductor device having aluminum alloy conductors. Iwasaki indicates that, "[t]he materials of the main conductive film 17 and the main conductive film 23 ... are, for example, aluminum, in which copper is added to provide good migration resistance." Iwasaki does not disclose or suggest that a first conductive layer is formed of a material different from that of a second conductive layer, and/or that second metal lines prevent ions of first metal lines from being diffused into a substrate. Therefore, Iwasaki does not cure the deficiencies of Anand recited above, and, accordingly irrespective of how one combines Anand and Iwasaki, one does not arrive at the structure of claim 12. Accordingly, independent claim 12 and all claims depending therefrom are in condition for allowance.

If the Examiner is of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is invited to contact the undersigned at the number identified below.

Respectfully submitted,

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October 31, 2005